

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

**CENNOX REACTIVE FIELD SERVICES, LLC
F/K/A TECNIFLEX LLC
d/b/a BANCOURCE**

Plaintiff,

v.

**CASH CLOUD, INC.
d/b/a Coin Cloud**

Defendant.

Case No. 6:22-cv-03274-RK

**PLAINTIFF CENNOX REACTIVE FIELD SERVICES, LLC'S
MOTION FOR DEFAULT JUDGMENT**

Plaintiff Cennox Reactive Field Services, LLC ("Plaintiff"), moves the Court Clerk to Enter Judgment against Defendant Cash Cloud, Inc. ("Defendant"), pursuant to Fed.R.Civ.P. 55(b)(1). In support of its Motion, Plaintiff states to the Court as follows:

1. On December 7, 2022, the Clerk made its Entry of Default pursuant to Fed.R.Civ.P. 55(a). (**See Doc 7**) The Entry of Default was made following Defendant's failure to file a responsive pleading.

2. As set forth in Plaintiff's Complaint, Defendant owes \$766,434.99 from unpaid invoices related to goods and services provided by Plaintiff to Defendant. (**See Doc 1**)

3. The Complaint also provides that Defendant is entitled to prejudgment interest at the maximum rate per law pursuant to the contract of the parties. (**See Doc 1**)

4. The total prejudgment interest from the time of service of the lawsuit to the default date amounts to \$5,748.26. (**See Ex. 1, Declaration of Bryan Wade**)

5. The Complaint provides that Defendant is entitled to attorney fees and costs

pursuant to the contract of the parties. (See **Doc 1**).

6. The total amount of attorney fees and costs amounts to \$3,120.00. (See **Ex. 1, Declaration of Bryan Wade**).

7. In total, Defendant owes Plaintiff the sum of \$775,303.25 (hereinafter “Judgment Sum”).

8. The Judgment Sum is a sum certain, calculated purely by contract, to which the Court Clerk may enter Default Judgment pursuant to Fed.R.Civ.P. 55(b)(1).

9. Defendant is a corporate entity, not a minor, incompetent person or military member. Fed.R.Civ.P. 55(b)(1).

10. Pursuant to Fed.R.Civ.P. 55(b)(1), a declaration is attached to this motion as Ex. 1, attesting to the Judgment Sum.

WHEREFORE, Pursuant to Fed.R.Civ.P. 55(b)(1), Plaintiff respectfully asks the Clerk to enter Default Judgment against Defendant for the Judgment Sum of \$775,303.25.

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CERTIFICATE OF SERVICE

I certify that on this 9th day of December 2022, a true and correct copy of the foregoing was electronically served on all counsel of record via the Court's ECF system.

By: Bryan Wade
Bryan Wade